

## Exhibit 2

## Huddleston v. DOJ (4:20CV447) Motion to Stay Briefing Schedule

From: Parker, Andrea (USATXE) (andrea.parker@usdoj.gov)

To: tyclevenger@yahoo.com

Date: Wednesday, February 23, 2022, 03:33 PM EST

Hey Ty –

As I emailed before, FBI is willing to conduct two additional searches in light of your challenges to the adequacy of FBI's search. I am going to ask the Court for a stay of the briefing schedule for 30 days to perform the searches, at which point we will file a status report detailing the search results. I will either propose a production schedule for any responsive records, or ask that the briefing schedule be reinstated if no records are found. If you continue to challenge the adequacy of the search, you can certainly continue to address that in briefing, as well as continue to request in camera review of the documents. We do not agree to in camera inspection at this time. The two searches will be limited to the searches of the FBI's Counterintelligence Division and the FBI's Operational Technology Division, to include the Data Intercept Technology Unit. I do not know the exact details of those searches, but FBI will certainly prepare a new declaration detailing the new searches. Again, if you continue to challenge the adequacy of the FBI's searches after the two new searches, you can continue to address that in briefing. But it is our hope that these new searches will address many of your concerns and simplify the issues pending before the Court.

I'm attaching a draft of my motion to stay, which I plan to file in the morning. Please let me know if you are opposed.

BRIT FEATHERSON

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